

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

SCANSOFT, INC.,

Plaintiff,

V.

C.A. No. 04-10353-PBS

VOICE SIGNAL TECHNOLOGIES, INC.,  
LAURENCE S. GILLICK, ROBERT S.  
ROTH, JONATHAN P. YAMRON, and  
MANFRED G. GRABHERR,

Defendants.

## VOICE SIGNAL TECHNOLOGIES MOTION FOR IMPOUNDMENT

Voice Signal Technologies, Inc. (“Voice Signal”) hereby moves pursuant to Local Rule 7.2 and section 14 of the parties’ agreed-to Protective Order for an order impounding an unredacted version of its Proposed Neutral Expert Procedure, Memorandum in Support of its Neutral Expert Procedure and Exhibit E to the Declaration of Richard C. Abati. A partially redacted copy of the Proposed Neutral Expert Procedure and Memorandum are being filed concurrently electronically; an unredacted copy of the Proposed Neutral Expert Procedure and Memorandum are being filed concurrently by hand.

As grounds for this motion, Voice Signal states that the Proposed Neutral Expert Procedure and Memorandum quote from ScanSoft’s Second Amended Answers to Voice Signal’s First Set of Interrogatories, which ScanSoft has designated “highly confidential” pursuant to the parties’ Protective Order. Pursuant to section 14 of the parties’ Protective Order, which was entered by the Court on March 11, 2005, any documents filed with the Court that

disclose highly confidential information, as defined by the Protective Order, must be filed under seal.

WHEREFORE, Voice Signal requests that the Court enter an order impounding the unredacted version of its Proposed Neutral Expert Procedure, Memorandum and Exhibit E of the Declaration of Richard C. Abati. Voice Signal further requests that the Court grant it leave, pursuant to Local Rule 7.2(d), to file its unredacted Proposed Neutral Expert Procedure, Memorandum and Exhibit E under seal concurrently with this motion for impoundment.

Respectfully submitted,

VOICE SIGNAL TECHNOLOGIES, INC.

By its attorneys,

/s/ Wendy S. Plotkin

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Sarah Chapin Columbia (BBO No. 550155)  
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Dated: December 16, 2005

CERTIFICATE PURSUANT TO LOCAL RULE 7.1

I certify that counsel for Voice Signal attempted to confer with counsel for ScanSoft on December 16, 2005, in an effort to resolve the issues presented in this motion but that counsel were not able to confer prior to filing this Motion.

/s/ Wendy S. Plotkin